

Exhibit 2

The Washington Post

Democracy Dies in Darkness

Daniel Snyder, in legal filing, accuses former team employee of spreading false stories

By **Will Hobson**

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Washington NFL owner Daniel Snyder accused a former team employee in a federal court filing Monday of taking part in what he says is an Internet misinformation campaign involving stories that falsely linked him to convicted sex criminal Jeffrey Epstein and Twitter bots that spread unfounded rumors of Snyder abusing drugs, holding “sex parties” and bribing NFL referees.

The filing, a request for discovery in federal district court in Alexandria, accuses Mary Ellen Blair, a former executive assistant to Snyder, of acting as an intermediary for unnamed adversaries Snyder thinks paid an India-based online news company to publish false stories linking him to Epstein.

“We know someone’s behind these slanderous and, quite frankly, despicable articles that were published,” said Joe Tacopina, an attorney for Snyder, in an interview Monday. “We need to understand who’s behind this with certainty. ... We want our proof.”

Blair’s attorney, Lisa J. Banks, released a statement denying her client had involvement with the Epstein stories and accused Snyder of seeking to “humiliate and intimidate” his former employee.

“This filing is an obvious and inappropriate attempt to silence Ms. Blair and others who may wish to communicate with legitimate news organizations about the culture of sexism, harassment and abuse that has existed at the highest levels of the Washington Football team for decades,” Banks said. “Bullying and baselessly disparaging former employees who provide truthful information about their experience with Dan Snyder and his organization will do nothing to repair the reputation he claims in this filing to care so deeply about.”

Snyder’s filing seeks documents from Blair as well as from Comstock Holding Companies, a Virginia real estate company that owns rental properties where Blair has lived. The filing alleges Blair received discounted rent for years while working for the same unidentified people who funded what Snyder believes is an orchestrated “fake news” Internet campaign against him.

Monday’s filing appears to mark an intensification in an ongoing dispute between Snyder and three minority owners of the team over the franchise’s direction. While his name is not mentioned in the filing, Dwight Schar, one of those minority owners seeking to sell his share of the team, is the father-in-law of Comstock chief executive Christopher Clemente. Schar’s daughter, Tracy Schar, is a senior vice president at Comstock and sits on the company’s board of directors.

Dwight Schar could not be reached to comment. A spokeswoman for Tracy Schar released a statement denying

"Any insinuation that Ms. Blair has received special treatment for any reason is patently false," wrote Denise Pattakos, a spokeswoman for Tracy Schar. "Any allegations or disparagement of Comstock is just spin designed to deflect from public reports of extremely disturbing behavior overseen by Mr. Snyder in his tenure as the majority owner of the Washington Football Team."

Tacopina declined to answer when asked whether Dwight Schar is one of the people he believes financed the alleged online false information campaign.

"We want to be able to depose Mary Ellen Blair, and get documents ... before we go mentioning anyone by name. ... But it's just a matter of time before this house of cards comes down," he said.

Monday's filing is connected to a lawsuit Snyder filed last week in Indian court against Media Entertainment Arts WorldWide, the parent company for the website that published the articles linking Snyder to Epstein.

"MEAWW intentionally sows disinformation at the behest of its undisclosed clients, including governments and intelligence services, and often is hired by clients that are cloaked behind several layers of anonymous corporate entities," Snyder's lawyers alleged in Monday's filing.

Last week, MEAWW officials acknowledged, in public statements, factual problems with the stories they published about Snyder but denied that outsiders had paid for their placement. On Monday night, MEAWW editor in chief Dean Williams reiterated his denial of Snyder's allegations.

"MEAWW still stands by its earlier statement that we have never taken money from any person or entities to publish a story," Williams wrote.

MEAWW has taken down the two stories, one of which was headlined "Washington Redskins owner Dan Snyder faces sex trafficking allegations; Internet says, 'He was on Epstein's list.'" The other was headlined, "RedskinsScandal: Will Dan Snyder rename Washington Redskins the 'Epsteins'?"

In Monday's filing, Snyder's lawyers also suggest the Indian company may have had a role in rumors spread on Twitter in July about a Washington Post story in the days before it was published.

"According to insiders and anonymous Washington Post employees, the [upcoming] article will allege that: Dan Snyder abuses drugs and alcohol[;] Snyder paid off refs. Some refs have made \$2 million from him ... Snyder and [former coach Jay] Gruden would hold sex parties with rampant drug usage and some sexual assaults[.] Snyder held nude photoshoots with the Redskins cheerleaders[.] Lawyers are already involved[.]," read one sample tweet, quoted in the court filing.

The Post story, published July 16, contained none of these allegations and instead focused on accusations of sexual harassment and verbal abuse by 15 former female team employees against several former top team executives. None of the women accused Snyder of sexual harassment.

Blair, the former assistant to Snyder, also mentioned The Post in conversations with current team employees, the court filing alleges. Blair had advance knowledge of a July 5 article that disclosed Schar and other minority owners were seeking to sell their stakes in the team and were “not happy being a partner” of Snyder, according to multiple people familiar with the deliberations.

On July 7, according to the filing, Blair told a team employee that they could “probably make a lot of money” for damaging information about Snyder. The next day, according to the filing, Blair told another team employee that an upcoming Post story would focus on how Snyder does “dirty” and “illegal” things. Tacopina, Snyder’s attorney, said he has recordings and sworn affidavits from current team employees supporting these allegations.

Blair worked for Washington’s NFL team from 2013 to 2017 as an executive assistant, the filing states, and was fired. The filing characterizes her as “disgruntled.”

Liz Clarke contributed to this report.

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